

**EXHIBIT – A**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BRET CHIAFALO and LEVI GUERRA,

## Plaintiffs.

V.

JAY INSLEE, in his official capacity as Governor of Washington, BOB FERGUSON, in his office capacity as Attorney General of Washington, and KIM WYMAN, in her official capacity as Washington Secretary of State,

## Defendants.

CASE NO.

## DECLARATION OF BRET CHIAFALO

Bret Chiafalo declares as follows:

1. I am over the age of eighteen and am competent to testify to the matters contained in this declaration.

2. I am a resident of the City of Everett and County of Snohomish, Washington. I ran for and was elected as a Presidential Elector Nominee for the 2<sup>nd</sup> Congressional District Democratic Party in Washington State.

3. I attended my 2nd Congressional District Caucus on May 21st 2016 and was elected as the 2nd CD Presidential Elector Nominee.

4. I was required by the Washington State Democratic Party and the Secretary of State office to sign a pledge to vote for the Democratic Party's nominees for President and Vice-President by August 12th 2016.

1       5.       I understand that the Democratic Presidential candidate is Hillary Rodham  
2 Clinton and the Democratic Vice-Presidential Candidate is Timothy Kaine.

3       6.       I understand that the majority of persons in Washington who cast their ballots  
4 on November 8, 2016, chose Hillary Clinton and Timothy Kaine for President and Vice-  
5 President. It is my understanding that those citizens' votes were not direct votes for the  
6 President and Vice-President, but rather votes for those candidates' slate of electors, of which  
7 I am a member.

8       7.       I understand that, based on the votes in the remaining 49 states and the District  
9 of Columbia that if all electors in the Electoral College vote the same as the popular votes in  
10 their respective states, Donald Trump and Michael Pence will become President and Vice-  
11 President despite them losing the nationwide popular vote by more than 2.6 million votes.

12       8.       Based on my investigation, deliberation, and research, I believe that Donald  
13 Trump is unfit for office due to what I understand to be his myriad conflicts of interest,  
14 including his foreign business dealings; his attacks on the First Amendment of the U.S.  
15 Constitution; his statements that he believes – against scientific evidence – that climate  
16 change and global warming are a “hoax;” the history of civil claims against him and his  
17 businesses; his temperament; his promises to discriminate against Muslims and Latinos; his  
18 recent correspondence regarding his personal business dealings with the governments of India  
19 and Argentina; his lack of experience (most recently embodied by his call with Taiwan); his  
20 selection for Attorney General a person who failed confirmation hearings in the 1980's due to  
21 sworn testimony that he was racist; his selection for Secretary of Education who lacks any  
22 teaching degree or experience, has likely never attended public schools, has refused to send  
23 her children to public schools, and has a vested interest in for-profit schools; his prior  
24 bankruptcies; his refusal to provide information regarding his investments and holdings; his  
25 penchant for nepotism; and his threats to use nuclear weapons against other sovereign nations.

26       9.       Based on my investigation, deliberation, and research, I believe that Michael

1 Pence is unfit for office due to, *inter alia*, his refusal to comply with federal law as set forth in  
 2 with *Obergefell v. Hodges* and *Roe v. Wade*; his hostility towards the freedom of and from  
 3 religion (particularly any religion other than Christianity); his efforts to shut down the federal  
 4 government unless Planned Parenthood was prohibited from receiving federal funds; his  
 5 belief – against all facts – that evolution, climate change, and global warming are “myths;” his  
 6 support for “conversion therapy” which seeks to “convert” homosexuals through methods  
 7 such as forcing people to engage in heterosexual intercourse; his refusal to comply; and his  
 8 discriminatory policies and statements regarding communities of color.

9       10. Based on my deliberation, investigation, and research, I believe that it is in the  
 10 best interests of Washington and the United States to prevent Trump/Pence from taking  
 11 office. Therefore, it is my duty, as a member of the Electoral College to vote in the best  
 12 interests of the state and nation. I cannot do that if the State is going to force me to vote for  
 13 Clinton/Kaine. While I am certain Clinton/Kaine are eminently qualified and fit to be  
 14 President and Vice-President, it may be that I need to vote for someone other than them to  
 15 prevent Trump/Pence from taking office. Therefore, I need the freedom to vote for any person  
 16 whom I feel is the most viable, fit, and qualified person to become President and/or Vice-  
 17 President.

18       11. I have been in contact with some of my fellow electors in other states and they  
 19 have all expressed reservations about Trump/Pence and the need to protect the country from  
 20 them. It is my desire and intent to vote for someone for President and Vice-President that will  
 21 either obtain 270 electoral votes and is not Trump/Pence or who will obtain enough votes in  
 22 the Electoral College to be one of the top-three vote getters if no candidates reach 270  
 23 electoral votes so that the House of Representatives can consider Mrs. Clinton, Trump, and  
 24 one other candidate whom the electors – or at least a large portion of us – agree is viable,  
 25 qualified, and fit for office. The same holds true for Vice President except that I understand  
 26 the top two vote-getters for that office will be decided by the Senate.

1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

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4 DATED this 08 day of December, 2016 at Everett, Washington.

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7 Bret Chiafalo

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